Serial No. 10/615,340   7
Docket No. T36-156717M/AIO

REMARKS

Claims 1-19 are all of the claims presently pending in the application. Claim 17 has merely been editorially amended, and has not been amended to more particularly define the invention or to overcome the Examiner's rejection.

Entry of this Amendment is believed proper since no new issues are being presented to the Examiner, which would require further consideration and/or search.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Vazan (U.S. Patent No. 6,753,897).

These rejections are respectfully traversed in the following discussion.

I.   THE CLAIMED INVENTION

The claimed invention of exemplary claim 1, provides a method of arranging a required number of LEDs including rearranging the LEDs to make the characteristic values of adjacent LEDs substantially equal (see Application at page 3, lines 9-17). This allows adjacent LEDs to emit light in a uniform manner without variation (see Application at page 4, lines 1-5).

II.   CLAIM REJECTION BASED ON PRIOR ART GROUNDS

The Examiner alleges that Vazan teaches the claimed invention of claims 1-19. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by Vazan.

Vazan teaches normalizing the properties of the LEDs by using an offset value stored in a memory, so that the LEDs emit light uniformly. The current input to the LEDs is adjusted. The position of the LEDs, however, remains constant. That is, the position of the LEDs are not rearranged.

In contrast, in the claimed invention, the LEDs are not necessarily normalized.

Serial No. 10/615,340   8
Docket No. T36-156717M/AIO

However, the LEDs may be <u>arranged</u> in a suitable manner based on the different properties of the LEDs. The <u>physical position</u> of the LEDs is adjusted or arranged.

That is, Vazan does not teach or suggest "<u>*rearranging* said *LEDs to make said*</u> *characteristic values of adjacent LEDs substantially equal*" (emphasis added by Applicants) as recited in claim 1 (and similarly recited in claims 5 and 16).

The Examiner attempts to rely on column 6, line 15 and column 4, line 3 of Vazan as teaching rearranging the LEDs to make the characteristic values of each adjacent LEDs substantially equal. The Examiner, however, is clearly incorrect.

That is, nowhere in these passages (nor anywhere else for that matter) does Vazan teach or suggest <u>rearranging the LEDs to make the characteristic values of adjacent LEDs</u> <u>substantially equal</u>. Indeed, Vazan does <u>not</u> even mention rearranging the LEDs, let alone teach or suggest the limitation recited in the claimed invention. Vazan merely teaches <u>adjusting the output</u> of the LEDs.

Applicants point out that the Examiner <u>must</u> consider the plain meaning of the language of the claims as well as the <u>plain meaning</u> of the language of the <u>prior art reference</u>. That is, the Examiner's latitude to provide a reasonably broad interpretation to Applicants' claim language does <u>not</u> extend to the <u>prior art.</u>

In this instance, Vazan clearly describes a current sensing method to provide uniform output power from the LED printbar using sets of correction values to compensate for the loss of output power from the LEDs (see Vazan at column 4, lines 40-45). Vazan teaches that the correction values are used to normalize the intensity of the LEDs' output (see Vazan at column 3, lines 50-60). Vazan does <u>not,</u> however, teach or suggest <u>rearranging the LEDs</u>.

In the Examiner's Response to Arguments section of the Office Action dated May 18, 2005, the Examiner alleges that Vazan teaches rearranging the LEDs to make the characteristic values of adjacent LEDs substantially equal (see Office Action dated May 18, 2005 at page 2, numbered paragraph 1). The Examiner attempts to rely on column 3, line 56 of Vazan to support this allegation. The Examiner, however, is clearly incorrect.

This passage of Vazan merely teaches "a first set of correction data to <u>normalize the</u> <u>light output of each LED</u> is determined and stored in a correction memory"(emphasis added by Applicants) (see Vazan at column 3, line 56). Again, Vazan merely teaches <u>to normalize the</u> <u>light output of each LED</u>. Vazan does <u>not</u> teach <u>rearranging</u> the LEDs. As indicated above,

Serial No. 10/615,340   9
Docket No. T36-156717M/AIO

the Examiner must consider the plain meaning of the language of the prior art reference.

Applicants point out that the Compact Oxford English Dictionary defines the term rearrange as "to arrange again in a different way". Similarly, the Encarta World English Dictionary defines the term rearrange as "to change the order or position of something". Therefore, the claimed invention of exemplary claim 1 may include changing (e.g., physically changing) the order or position of the LEDs. Vazan, however, does not teach or suggest changing the order or position of the LEDs.

Therefore, if the Examiner wishes to maintain this rejection Applicants request the Examiner to specifically point out where Vazan teaches or suggests that normalizing the output of the LEDs is equivalent to rearranging or changing the order or position of the LEDs, as in the claimed invention.

Furthermore, in the Examiner's Response to Arguments section, the Examiner alleges that "Applicants also argue that Vazan does not teach the arrangement of the LEDs in the printbar" (see Office Action dated May 17, 2005 at page 2). Applicants submit that the Examiner has clearly misunderstood Applicants' arguments.

That is, in the Amendment filed on February 28, 2005, Applicants clearly stated that "Vazan does not teach altering the arrangement of the LEDs in the printbar" (emphasis added by Applicants) (see Amendment filed February 28, 2005 at page 8). This feature is not taught or suggested by Vazan. That is, the arrangement of the LEDs in Vazan clearly remains constant.

Regarding dependent claims 10 and 11, the Examiner alleges that Vazan discloses that the LEDs are arranged beginning with an LED having a smallest characteristic value of the LEDs to an LED having a largest characteristic value (see Office Action dated May 17, 2005 at page 4). The Examiner attempts to rely on column 5, line 47 of Vazan to support this allegation.

Applicants submit that the Examiner is clearly incorrect. That is, this passage in Vazan merely teaches that alternate LEDs are loaded "1" and "0" and are turned off and on by the exposure time of the printbar data (see Vazan at column 5, lines 46-51). Again, the Examiner has mischaracterized the plain meaning of the language of Vazan. Indeed, this passage of Vazan does not even mention arranging the LEDs, let alone teach or suggest the specific limitations of dependent claims 10 and 11.

Serial No. 10/615,340   10
Docket No. T36-156717M/AIO

    Therefore, Applicants submit that there are elements of the claimed invention that are not taught or suggested by Vazan. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

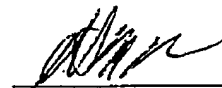## III. FORMAL MATTERS AND CONCLUSION

    In view of the foregoing, Applicants submit that claims 1-19, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

    Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

    The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: July 8, 2005

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Serial No. 10/615,340   11
Docket No. T36-156717M/AIO

FACSIMILE TRANSMISSION

     I hereby certify that I am filing this paper via facsimile, to Group Art Unit 2821, at (703) 872-9306, on July 8, 2005.

Respectfully Submitted,

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